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Federal Election Commission Office of Complaints Examination and Legal Administration Attn: Kathryn Ross 999 E Street NW Washington, DC 20436

MUR 7157 Re:

Dear Commissioners:

I write as counsel to the Alliance for Retired Americans ("the Alliance) in response to the complaint filed against it by Project Veritas Action Fund and James O'Keefe III. The complaint should be dismissed as to the Alliance because it fails to allege any facts that would constitute a violation of the Federal Election Campaign Act. Consequently the Alliance is confronted with responding to a complaint that fails to recite any conduct in which it has engaged that even remotely implicates it in a violation of the law or the Commission's regulations. The only reference to the Alliance in the complaint is a quote from Scott Foval that suggests that the Alliance is a client of Mr. Foval. The Alliance is not and has never been a client of Mr. Foval or his employer.

Based on the complete absence of any facts in the complaint that would constitute a violation of the Federal Election Campaign Act or the Commission's regulation, the Alliance requests that it be dismissed from this matter.

Very truly yours,

Karl J. Sandstrom

KJS